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FCC-MAILROOM

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William F. Caton, Acting Secretary
Office of the Secretary
Federal Communications Commission 12th Street, S.W.
Room TW-A325
Washington, D.C. 20554

Dear Mr. Caton

Re: RM-10687

Questar InfoComm, Inc. ("Questar") is filing this comment in opposition to RM-10687, "ITA Informal Request for Certification to Coordinate Power Radio Service, Railroad Radio Service, and Automobile Emergency Radio Service under Part 90 of the Commission's Rules." Questar recommends that United Telecom Council ("UTC") continue to act as the exclusive coordinator for these frequencies.

Questar InfoComm is a wholly owned subsidiary of Questar Corporation, and provides technology services to affiliate companies and to third parties. Questar Corporation is a fully integrated natural gas company. Questar's operations include exploration, production, transmission and retail distribution throughout the western United States. Questar Pipeline Company owns underground storage facilities in Utah and Wyoming and transmission pipelines throughout the west. Questar Gas Company is a natural gas public utility serving more than 750,000 residential, commercial and industrial customers in Utah, southwestern Wyoming and a portion of southeastern Idaho.

Questar operates RF systems in the 48 MHz, 150 -170 MHz, 450 MHz, 800 MHz, 960 MHz, 2 GHz and 6 GHz spectrum bands. Questar coordinates the activities of field personnel, plant operations, telemetry, safety and security monitoring with its voice and data communications systems. All of Questar's communications systems carry mission critical information. Priority access on interference free channels gives Questar an invaluable tool to manage any incident whether it is routine work, a life threatening emergency, or an act of terrorism. At the current time, proper frequency coordination allows our communications systems to operate at peak performance to insure emergency communications, security communications and day to day messages to be communicated clearly.

Under current FCC Rules, UTC can offer only limited protection to critical infrastructure systems on the former Power Radio Service frequencies. It honors all requests for

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coordination by Industrial/Business eligibles, as well as any requests by other I/B coordinators. In accordance with the Rules, it can deny an application for these frequencies only upon a showing that the proposed system would have a demonstrable, material, adverse effect on safety, mandating a written supporting statement explaining the technical basis for any denial. (47 C.F.R. § 90.175(b) (2))

It is vitally important that mission-critical communications systems are protected from congestion and harmful interference to the extent possible under the Commission's Rules. UTC has been a good steward in this role in the past. It is appropriate that it remain the exclusive coordinator for these few frequencies, given its deep understanding of natural gas, electrical and water telecommunications systems. The fact that some utilities may have become members of ITA does not change its focus on general business and industry.

UTC's representation of natural gas, electrical and water systems extends well beyond frequency coordination to all of its activities in support of its members. In spite of the diversity in size and ownership among the thousands of utilities across the country, they all have one overriding concern, i.e., that critical infrastructure (CI) systems continue to be adequately protected from congestion and harmful interference. The expansive nature of utility infrastructure (including natural gas pipelines, electricity transmission lines, water systems, and other utility infrastructure) requires reliable maintenance, remote monitoring and repair. These requirements can only be met effectively through telecommunications and, traditionally, the most critical component in a CI entity's telecommunications arsenal has been its wireless network.

UTC knows the utility business and understands the requirements for effective utility and critical infrastructure telecommunications systems. Questar opposes RM-10687 and its proposal to allow ITA to coordinate former Power, Railroad and Auto Emergency frequencies. Instead, Questar respectfully encourages the Commission to allow UTC to continue to effectively perform this coordination and oversight function.

Respectfully Submitted,
Jonathan M. Duke
Senior Corporate Counsel

